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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. CR 14-412 TEH
)	
Plaintiff,)	STIPULATION AND [PROPOSED] ORDER
)	REGARDING CONTINUING SENTENCING
v.)	FROM JANUARY 25, 2015 TO FEBRUARY 29,
)	2016
VALENTINO JOHNSON,)	
)	
Defendant.)	
_____)	

The defendant, VALENTINO JOHNSON, represented by Niall Lynch, Nicholas Lin, and Aaron Chiu of Latham & Watkins, LLP, and the government, represented by Rita Lin, Assistant United States Attorney, (collectively, the “parties”) are currently scheduled to appear before the Court on January 25, 2016, at 2:30 p.m. for sentencing. The parties, by and through their counsel, respectfully request a continuance of the defendant’s sentencing to February 29, 2016 at 2:30 p.m. The parties anticipate that an evidentiary hearing will be required as part of the sentencing that will take approximately an hour and half. The parties understand from consultation with the Court’s courtroom deputy that the Court’s preference would be to proceed with such a hearing on a date when no other matters will be on calendar at that time. Accordingly, upon consultation with the Court’s courtroom deputy, the parties respectfully

STIPULATION AND [PROPOSED] ORDER
NO. CR 14-00412 TEH

1 request to set the evidentiary hearing and sentencing for February 29, 2016 at 2:30 pm. The parties have
2 been in communication with United States Probation Officer Insa Bel'Ochi, and have agreed that
3 providing Probation with additional time to complete its investigation for the Presentence Report would
4 be advisable as well. The parties have conferred with Officer Bel'Ochi, and she is available on February
5 24, 2016 at 10:00 a.m.

6 SO STIPULATED.

7 Dated: December 7, 2015

Respectfully submitted,


8 BRIAN J. STRETCH
9 Acting United States Attorney

10 /s/
11 Rita F. Lin
12 Assistant United States Attorney

13 /s/
14 Niall Lynch
15 Counsel for Defendant Valentino Johnson

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18 SO ORDERED.

19 DATED: December 9, 2015

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21 HON. THELTON E. HENDERSON
22 Senior United States District Judge
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